



# **FWEC/CHURCH ROAD TCE SITE**

## **Frequently Asked Questions (FAQs)**

**U.S. Environmental Protection Agency**

**Region 3, Philadelphia, PA    November 2008**

**Introduction:** The following questions were submitted by residents during the September 25, 2008 public information session for the Foster Wheeler Energy Corporation/Church Road TCE Site in Mountain Top, Pennsylvania. The questions and EPA's corresponding responses have been developed to contribute to your understanding of the sites' background, EPA and others' involvement, and investigation and cleanup activities conducted to date. Questions are organized by topic; several are cross-referenced when they relate to multiple topic headings. For a copy of this document and other site-related updates, factsheets, timelines, and photos, please visit EPA's On-Scene Coordinator website at [www.epaosc.net/churchroadtce](http://www.epaosc.net/churchroadtce).

**Note:** For the purposes of this FAQ, the former Foster Wheeler Energy Corporation (FWEC) facility addressed by the 1988 Response Action will be referred to as the FWEC Site, and contamination along Church Road addressed by the 2005 Response Action will be referred to as the Church Road TCE Site. Together, they will be referred to as the FWEC/Church Road TCE Site.

**Site Snapshot:** The Environmental Protection Agency (EPA), in cooperation with the Foster Wheeler Energy Corporation (FWEC) and the Pennsylvania Department of Environmental Protection (PADEP), recently conducted an extensive Removal Action at the Church Road TCE Site to address any immediate threats to public health and the environment (see "Site Background" below for more detail). **Major components of the Removal Action included:** supplying bottled water to affected homes, installing carbon filters in homes, connecting affected residents to public water, and conducting extensive sampling to determine the source, nature, and extent of the problem.

**Next Steps:** While EPA's Removal Action has addressed immediate, short term threats, EPA will now conduct a Remedial Action to ensure long-term protection of human health and the environment. The Remedial Action will consist of additional data collection, remedy evaluation and selection, and remedy implementation and will encompass both the FWEC Site and the Church Road TCE Site. The first step in the process, called the Remedial Investigation and Feasibility Study (RI/FS), is projected to commence in Spring 2009.

**EPA Site Contacts:** For more information, please contact:

**John Epps**, Remedial Project Manager (215) 814-3144

**Chris Corbett**, Remedial Project Manager (215) 814-3220

**Raj Sharma**, On-Scene Coordinator (215) 814-3260

**Larry Johnson**, Community Involvement Coordinator (215) 814-3239

**Or visit us on-line at:** [www.epaosc.net/churchroadtce](http://www.epaosc.net/churchroadtce)

## **SITE HISTORY and BACKGROUND**

**Question:** Why wasn't the FWEC Site taken through the full Remedial Process when contamination was first identified in the late 1980's?

**Answer:** EPA Response Actions are triggered by threats to human health or the welfare of the environment. These threats were believed to be addressed by the Removal Action (groundwater treatment system) in the 1980's, and no further action was deemed necessary at that time. **Background:** Contamination was first discovered at the former FWEC facility during an investigation conducted prior to a real estate transaction in 1985. In 1986, an additional investigation was conducted at the FWEC facility consisting of soil sampling and groundwater monitoring well installation and sampling. Residential well sampling was conducted in May 1986 by the Pennsylvania Department of Environmental Resources (PADER, now PADEP). No volatile organic compounds (including trichloroethylene (TCE)) were detected in samples from seven residential wells located along Church Road in close proximity to the FWEC Site, indicating contamination had not migrated offsite.

In 1988, FWEC entered into a tri-party Consent Agreement and Order with EPA and PADEP requiring FWEC to conduct additional site investigation activities and to implement remedial measures to remove, stabilize, contain, or treat contamination onsite and prevent or abate contaminant migration. The remedial measures consisted of the installation of a groundwater treatment system that has operated from 1993 to the present. Data collected during the operation of the treatment system indicated that the system was operating as designed and effectively containing and treating contamination. Based on the available data, no further remedial response or investigation was deemed necessary until 2004 when contamination was discovered along Church Road.

**Question:** During the initial investigation in the 1980s, who determined which residential wells were tested? Were hydrogeologists consulted at that time and who determined that the wells to test should be in an uphill direction from the FWEC Site?

**Answer:** Available records from 1986 indicate that the residential well sampling locations were selected by PADER (now PADEP) hydrogeologists. PADER also collected and analyzed the samples. The records indicate that the sampling locations were selected based on their proximity to the FWEC Site and the anticipated groundwater flow direction at that time. Accurate location data is not currently available for all of the wells sampled in 1986; however, the sampling locations that were verified are within the groundwater flow path (hydraulically downgradient) and downhill from the FWEC Site.

**Question:** Who was monitoring the FWEC groundwater treatment system from 1988 through 2004?

**Answer:** EPA and PADEP have provided oversight of the treatment plant operation. Sampling results and progress reports have been provided to PADER/PADEP and EPA by FWEC since the system was placed into operation in October 1993. Monitoring of the system has been conducted on a quarterly basis by FWEC's consultant from 1993 through 1998 and on an annual basis from 1998 through the present.

**Question:** Why weren't residents along Church Road notified of the contamination at the former FWEC facility in the 1980's?

**Answer:** The investigation conducted during the initial Response Action at the FWEC Site did not indicate that contamination had migrated offsite or impacted residential wells at that time. Furthermore, the initial Response Action was conducted by EPA's Removal Program in conjunction with PADEP's Solid Waste Management Act Program (now Hazardous Site Cleanup Act (HSCA)), which does not require public notification unless an immediate threat to public health is suspected. Based on the results of that investigation, no threat to public health was suspected, and public notice was deemed unnecessary.

**Question:** What caused FWEC to test residential wells along Church Road in 2004?

**Answer:** Sampling of the residential wells was related to the PADEP Land Recycling and Environmental Remediation Standards Act (Act 2) voluntary cleanup program, under which the FWEC Site was being managed by the property owner at that time. In accordance with the requirements of the Act 2 program, the sampling was conducted to verify that contamination had not migrated offsite.

**Question:** Hasn't a Remedial Investigation been in progress since contamination along Church Road was discovered in 2004?

**Answer:** A formal Remedial Investigation (RI) has not yet been conducted at the FWEC/Church Road TCE Site. However, extensive sampling has been conducted in the vicinity of Church Road and the former FWEC facility since 2004, including sampling over 150 residential wells, as a component of EPA's short-term Removal Action. The RI, one of the first steps in the long-term EPA Remedial Action, will further evaluate the nature and extent of contamination to ensure that long-term protection of human health and the welfare of the environment is achieved by the selected remedy. Previously-collected data will be used during the RI and will serve as a basis for the additional investigative work. The RI is projected to commence in Spring 2009.

**Question:** What was EPA's Hazard Ranking Score (HRS) for the FWEC Site 20 years ago, and what is the new score for the FWEC/Church Road TCE Site?

**Answer:** The initial Hazard Ranking Score for the FWEC Site was prepared in 1990 and did not exceed the threshold value of 28.5. Because the site was not placed on the National Priorities List (NPL) at that time, the numerical value of the Hazard Ranking Score is confidential. The current Hazard Ranking Score for the FWEC/Church Road TCE Site exceeds 28.5; therefore, the site is considered NPL-caliber.

## **CURRENT SITE STATUS**

**Question:** What are the current levels of contamination at the FWEC Site?

The most recent available sampling data from the onsite monitoring well network indicates the TCE concentration has decreased from a high of 180,000 parts per billion (ppb) prior to implementation of the treatment system outlined in the "Site Background" section, to a maximum concentration of 17,000 ppb in the contaminant source area near the center of the FWEC Site. TCE concentrations in the downgradient groundwater treatment system capture zone area have decreased from a maximum of 1,800 ppb, detected prior to treatment. Concentrations in this downgradient area currently range from non-detect to 160 ppb. EPA will be making annual sampling reports from the five most recent sampling events available on the EPA On-Scene Coordinator website ([www.epaosc.net/churchroadtce](http://www.epaosc.net/churchroadtce)) during the Fall 2008.

**Question:** Will the groundwater treatment system at the former FWEC facility continue to operate?

**Answer:** FWEC is legally required to continue to operate the groundwater treatment system by the 1988 Consent Agreement and Order between FWEC, EPA, and PADEP. Samples are collected on an annual basis from groundwater monitoring wells located on the former FWEC property and submitted to PADEP and EPA for review.

**Question:** What was EPA's Hazard Ranking Score (HRS) for the FWEC Site 20 years ago, and what is the score for the FWEC/Church Road TCE Site?

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## **SUPERFUND CLEANUP PROCESS**

**Question:** What is a Remedial Investigation/Feasibility Study?

**Answer:** The EPA's Remedial Investigation (RI) serves as the mechanism for collecting data to characterize site conditions, determine the nature and extent of contamination, assess risk to human health and the environment, and conduct treatability testing to evaluate the potential performance and cost of the treatment technologies that are being considered. The Feasibility Study (FS) is the mechanism for the development, screening, and detailed evaluation of remedial action alternatives.

The RI and FS are conducted concurrently. Data collected in the RI influence the development of remedial alternatives in the FS, which in turn affect the data needs and scope of treatability studies and additional field investigations. This phased approach encourages the continual scoping of the site characterization effort, which minimizes the collection of unnecessary data and maximizes data quality.

Typical field activities conducted during the RI/FS consist of groundwater monitoring well installation and sampling, regional and local geologic evaluations, soil sampling, vapor intrusion testing, and pilot-scale testing of remedial technologies. A baseline risk assessment is also developed to identify the existing or potential risks that may be posed to human health and the environment by the site. Because this assessment identifies the primary health and environmental threats at the site, it also provides valuable input to the development and evaluation of alternatives during the FS. Additional information on the Superfund process is available on the internet at [www.epa.gov/superfund](http://www.epa.gov/superfund).

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**Answer:** A formal Remedial Investigation (RI) has not yet been conducted at the FWEC/Church Road TCE Site. However, extensive sampling has been conducted in the vicinity of Church Road and the former FWEC facility since 2004, including sampling over 150 residential wells, as a component of EPA's short-term Removal Action. The RI, one of the first steps in the long-term EPA Remedial Action, will further evaluate the nature and extent of contamination to ensure that long-term protection of human health and the welfare of the environment is achieved by the selected remedy. Previously-collected data will be used during the RI and will serve as a basis for the additional investigative work. The RI is projected to commence in Spring 2009.

**Question:** During the RI/FS process, will results of the investigation be made available to the public?

**Answer:** EPA will communicate the results of the investigation to the public throughout the entire investigation and cleanup process. Sampling data, fact sheets, responses to resident questions, historic reports, and photographs are currently available on the EPA On-Scene Coordinator website ([www.epaosc.net/churchroadtce](http://www.epaosc.net/churchroadtce)). This website will continue to be updated until RI/FS field work begins, at which time the information will be transferred to the EPA Remedial Program website, which has not yet been created. The new website will contain the currently available information and any new information generated during the RI/FS. EPA will provide notice when the transition occurs. Additionally, interested residents are encouraged to

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join the existing Community Advisory Group (CAG). EPA will provide residents on the CAG mailing list with Quarterly Progress Reports during the RI/FS to keep those residents without internet access up to date on investigation activities. Please contact Larry Johnson for more information on the CAG.

**Question:** What was EPA's Hazard Ranking Score (HRS) for the FWEC Site 20 years ago, and what is the score for the FWEC/Church Road TCE Site?

**Answer:** The initial Hazard Ranking Score for the FWEC Site was prepared in 1990 and did not exceed the threshold value of 28.5. Because the site was not placed on the National Priorities List (NPL) at that time, the numerical value of the initial Hazard Ranking Score is confidential. The current Hazard Ranking Score for the FWEC/Church Road TCE Site exceeds 28.5; therefore, the site is considered NPL-caliber.

**Question:** Why can't the public be involved in the cleanup process until a Settlement Agreement is reached with Foster Wheeler?

**Answer:** Community Involvement is encouraged at all times during the Superfund process and interested residents are encouraged to contact Larry Johnson for information regarding the Community Advisory Group (CAG). The CAG is the community's voice to the Agency and all citizens are invited to participate. Additionally, at the completion of Settlement Agreement negotiations, a public meeting will be held to inform area residents of the results of the settlement, provide a projected schedule, and to obtain input from area residents that may assist EPA and FWEC in the investigation. If residents have questions prior to the completion of negotiations and the public meeting, they are encouraged to contact John Epps or Chris Corbett. Details of Settlement Agreement are confidential while negotiations are ongoing; however, the document will be made available to the public when it is finalized.

**Question:** Will there be oversight of FWEC during the RI/FS? Since FWEC will be conducting the RI/FS, is this considered a conflict of interest?

**Answer:** EPA will provide oversight of the RI/FS, with contractor support. Following the negotiation of the Settlement Agreement with EPA, FWEC will prepare an RI/FS Work Plan for review and approval by EPA. FWEC will implement the approved Work Plan, however, EPA, EPA's oversight contractor, and PADEP will provide oversight and collect confirmation samples with FWEC when appropriate. This is the standard procedure under the Superfund cleanup process and is not considered a conflict of interest. Having the potentially responsible party conduct investigation and remediation work is the most preferable scenario at a Superfund site because the potentially responsible party bears the financial burden directly.

**Question:** Has EPA determined that FWEC is the source of contamination?

**Answer:** Based on the investigations conducted to date, FWEC appears to be a source for TCE contamination at the Church Road TCE Site. However, additional investigation activities will be conducted during the RI/FS to determine if other sources exist.

**Question:** What is the Superfund Alternative Site (SAS) process?

**Answer:** The SAS process is identical to the standard Superfund Remedial process except that SAS sites are not listed on the National Priorities List (NPL). In practical terms, this means that SAS sites can begin the investigation phase more quickly than standard sites because the time to list the site on the NPL is eliminated. NPL listing typically takes over a year. All other facets of the program remain intact, including Community Involvement, as discussed below. A brief overview of the steps involved in a Superfund cleanup is provided on the EPA On-Scene Coordinator website ([www.epaosc.net/churchroadtce](http://www.epaosc.net/churchroadtce)).

**Question:** Will a Technical Assistance Grant (TAG) still be made available under the SAS process?

**Answer:** Yes. One of the most important elements of a Superfund Response Action is the availability of technical assistance to the public. This assistance typically comes in the form of a TAG to help the community hire an independent technical advisor and the SAS process also includes this important provision. Under the SAS process, the potentially responsible party, in this case FWEC, would provide up to \$50,000 per year to be placed in a site-specific special account to be controlled and administered by EPA. EPA is then responsible for distribution of the funds to the community group. This is an identical administration process and an identical amount of money that is provided in comparison to a standard Superfund Response Action. The TAG will be established following the negotiation of the Settlement Agreement for performance of the RI/FS.

## **PUBLIC HEALTH**

**Question:** Does excavation in the Mountain Top area present a danger to residents?

**Answer:** Contamination at the Church Road TCE Site is primarily in bedrock groundwater and in groundwater at the soil-bedrock interface and not in soils. Therefore, if a shallow excavation were conducted that did not encounter the bedrock surface and did not encounter shallow groundwater, there is currently no indication that TCE contamination would be encountered. It should be noted, however, that an excavation conducted in the vicinity of a known seep or spring has the potential to encounter TCE contaminated groundwater. Additional data will be collected during the RI to further characterize the area and evaluate risks associated with excavation activities. Any resident considering any earth disturbance activities on their property is encouraged to contact EPA to discuss the extent of groundwater contamination in the vicinity of the excavation.

**Question:** What risks are associated with installing a groundwater well to supply a sprinkler system?

**Answer:** Residents who have entered into a settlement agreement with FWEC and/or residents who have deed restrictions in place are not permitted to install a new well on their property. Residents who do not meet either of the above criteria may install a new well in accordance with township and state regulations. Additional data will be collected during the RI to further characterize the area and evaluate risks associated with such activities. Any resident considering any earth disturbance activities on their property is encouraged to contact EPA to discuss the extent of groundwater contamination in the vicinity of the excavation.

**Question:** When will subsequent health assessments be conducted?

**Answer:** The next planned health assessment will consist of the Human Health Risk Assessment during the RI/FS. This assessment will be a mathematical analysis of exposure scenarios based on the data collected during the RI.

**Question:** What is the condition of Watering Run from FWEC Site to the Big Wapallopen Creek? Is this creek clean and safe?

**Answer:** While trace concentrations of TCE have been detected in Watering Run, the creek does not pose a human health threat as these concentrations are below applicable regulatory limits.

## **WELL SAMPLING and RELATED ISSUES**

**Question:** During the investigation at the FWEC Site in the 1980s, who determined which residential wells were tested? Were hydrogeologists consulted at that time and who determined that the wells to test should be in an uphill direction from the FWEC Site?

**Answer:** Available records from 1986 indicate that the residential well sampling locations were selected by Pennsylvania Department of Environmental Resources (PADER, now PADEP) hydrogeologists. PADER also collected and analyzed the samples. The records indicate that the sampling locations were selected based on their proximity to the FWEC Site and the anticipated groundwater flow direction at that time. Accurate location data is not currently available for all of the wells sampled in 1986; however, the sampling locations that were verified are within the groundwater flow path (hydraulically downgradient) and downhill from the FWEC Site.

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**Question:** Who should residents contact to request sampling of their home?

**Answer:** Please contact Raj Sharma with any sampling requests or other concerns. Mr. Sharma will evaluate the situation and determine the appropriate course of action. If Mr. Sharma is not available, John Epps, Chris Corbett, or Larry Johnson may also be contacted.

Recently, EPA was contacted by multiple residents requesting sampling of basement sumps. Currently, all known sumps within the Church Road TCE Site have been sampled and results have been provided to residents.

**Question:** Will residents be supplied with the guardian well sampling results?

**Answer:** EPA is currently in the process of editing guardian well test results of confidential information, such as addresses and names of residents. When this process is complete, guardian well sampling results from all past sampling events and any future sampling events will be posted to the EPA On-Scene Coordinator website ([www.epaosc.net/churchroadtce](http://www.epaosc.net/churchroadtce)).

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**Question:** Residents have encountered yellow or discolored water in basement dehumidifiers. Is this related to TCE contamination along Church Road?

**Answer:** TCE is a colorless liquid and does not cause discoloration of water.



## **AIR QUALITY (VAPOR INTRUSION)**

**Question:** Has a vapor intrusion investigation been conducted?

**Answer:** EPA and PADEP have conducted a vapor intrusion investigation at ten (10) homes along Church Road determined to be at the highest risk for vapor intrusion. The sampling results indicated that vapor intrusion was not a concern at any of the tested residences.

**Question:** Is air quality at the former FWEC facility impacted by the groundwater treatment system?

**Answer:** Air quality at the former FWEC facility was evaluated when the system was installed and no impact was found. Additionally, due to the small size of the treatment plant and its location at the site, air quality concerns, if present, would be localized within the FWEC property only, which is currently unoccupied.

## **COMMUNITY INVOLVEMENT and PUBLIC NOTIFICATION**

**Question:** During the RI/FS process, will results of the investigation be made available to the public?

**Answer:** EPA will communicate the results of the investigation to the public throughout the entire investigation and cleanup process. Sampling data, fact sheets, responses to resident questions, historic reports, and photographs are currently available on the EPA On-Scene Coordinator website ([www.epaosc.net/churchroadtce](http://www.epaosc.net/churchroadtce)). This website will continue to be updated until RI/FS field work begins, at which time the information will be transferred to the EPA Remedial Program website, which has not yet been created. The new website will contain the currently available information and any new information generated during the RI/FS. EPA will provide notice when the transition occurs. Additionally, interested residents are encouraged to join the existing Community Advisory Group (CAG). EPA will provide residents on the CAG mailing list with Quarterly Progress Reports during the RI/FS to keep those residents without internet access up to date on investigation activities. Please contact Larry Johnson for more information on the CAG.

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**Question:** Has the engineering report submitted by the affected community been taken into account in your evaluations?

**Answer:** EPA appreciates and values the hard work done by this dedicated, conscientious citizen. The report will be evaluated during the RI.

## **OVERSIGHT and O&M**

**Question:** Who was monitoring the FWEC groundwater treatment system from 1988 through 2004?

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## **LAND DEVELOPMENT**

**Question:** Are real estate developers in the vicinity of Mountain Top required to contact EPA and PADEP prior to developing the property?

**Answer:** Real estate developers are not legally required to contact EPA or PADEP. However, often when developing a commercial property, a real estate developer will conduct what is referred to as "environmental due diligence," typically consisting of a Phase I Environmental Site Assessment (Phase I) performed by a third party environmental consultant. Although not required by law, banks often require that a Phase I be completed in order to obtain financing to acquire a property. One component of a Phase I is contacting EPA, PADEP, the county or state health department, and the township or borough office to inquire if any known environmental concerns exist at the subject property or in the surrounding area. Additionally, most Phase I providers conduct a computer database review for features of the surrounding area, such as wells, waste handling facilities, and environmental sites.